

Ref: M-USA000

5 November 2002

Sally Stratmoen  
Chief, Equivalence Section  
International Policy Staff  
Office of Policy, Program Development and Evaluation  
Food Safety Inspection Service, US Department of Agriculture  
Room 4434- South  
1400 Independence Avenue, SW  
Washington D.C. 2050 - 3700  
UNITED STATES OF AMERICA

Dear Sally

**Draft Final Audit Report for New Zealand  
April 3 Through April 30, 2002**

Thank you for the opportunity to provide comment on the Draft Final Audit Report.

New Zealand considers the report to overall be a true reflection of the findings of this audit. Issues identified at individual establishments were either addressed at the time of the audit or subsequently.

With regard to the HACCP findings New Zealand is working with industry and the MAF Verification Agency on initiatives which include a revision of the Unit Standard for the assessment of competency of HACCP Co-ordinators, and the ongoing skill maintenance of these people. Other strategies are also being formulated which will allow the NZ Food Safety Authority to measure the adequacy and understanding with regard to HACCP Implementation at establishment level.

Appended as Appendix I are comments we wish to make in relation specific points made in the Draft Final Audit report itself.

Yours sincerely

Dr Tony Zohrab  
Director (Animal Products)

## NZFSA Comment on the Draft Final Audit Report

3 April to 30 April 2002

### Results and Discussion

#### Headquarters Audit (Page 4)

Corrective and preventive actions recording.	These are clear non-compliances with requirements issued by NZ Food Safety Authority (NZFSA). Resolution has occurred.
Flow charts did not include all process steps.	At the time of the paper based audit of HACCP plans the auditor was provided with HACCP Plan Summary Sheets and not necessarily the flow charts in some instances. Since the audit MAF Verification Agency (MAF VA) has carried out reviews to ensure that flow charts are in fact in place. This has largely proven to be the case. Where any deficiency has subsequently been identified it has been corrected and verified by MAF VA.
"Faecal contamination" not included in hazard analysis.	NZFSA does not consider faecal contamination to be a hazard, it is a source of food safety hazards. Enteric pathogens from the gastrointestinal tract, hide/wool and skin should have been mentioned in the hazard identification and analysis. (See further comments below under <i>HACCP Implementation</i> .)
No critical control points specified (CCPs).	At FSIS request subsequent to the 2001 FSIS audit, NZFSA has mandated at least one CCP and hence a HACCP plan into each US listed premises. Refer to OMAR 02/025 (appended), which required implementation by 30 June 2002.
Critical limits were not measurable in three establishments.	NZFSA agrees that they should be measurable. MAF VA has since verified that where any deficiencies were identified remedial action has been taken. It would appear that HACCP Co-ordinators were generally not present during the audits and other staff present were not able to provide

explanations in this regard that would satisfy the auditors enquiry.

No pre-shipment document reviews in three establishments.

The three premises identified in the audit report were the subject of the paper-based audit at headquarters. As the HACCP plan and such records are not held at headquarters, material was faxed in at the time of the audit to allow the auditor to perform his paper-based audit.

Subsequent checking by MAF VA has indicated that records were available at the premises concerned, but had not been faxed in for the auditor to examine. However, should any such instances be found at any time whether by MAF VA, CIG auditors or by an FSIS auditor NZFSA would regard it as a clear non-compliance.

#### Government Oversight

First paragraph, last sentence.

This should read: "ASURE is a State Owned Enterprise of the Ministry of State Enterprises which provides inspection services on behalf of MAF FAA." MAF FAA has previously provided FSIS with a considerable amount of information with regard to this relationship and awaits further response.

#### Sanitation Controls

##### Sanitation Standard Operating Procedures.

MAF VA has subsequently verified that corrective and preventive actions are now being properly recorded in the four establishments identified by the auditor.

#### Animal Disease Controls

Controls of condemned material were lacking at ME 117

This non-compliance which had been the subject of a key issue at a previous CIG audit led to suspension of certification for exports to the USA until MAF VA provided an assurance that all aspects of this programme were fully compliant. NZFSA was

disturbed at such a finding of a key FSIS requirement.

## **Slaughter/Processing Controls**

The deficiencies noted at the three identified establishments have since been verified as being in compliance by MAF VA.

### **HACCP Implementation**

Flow charts without all process steps included. See early comments in Headquarters Audit section above.

"Faecal contamination" not included in hazard analysis.

See early comments in Headquarters Audit section above.

NZFSA has historically provided an option as to whether Zero Faecal Tolerance (ZFT) is included as part of a HACCP plan or is operated outside it. The auditor acknowledged that ZFT was being managed to his satisfaction in all instances and that the outcomes were satisfactory.

No pre-shipment reviews in three establishments.

See early comments in Headquarters Audit section above.

Verification, validation and reassessment of HACCP plans.

NZFSA is requesting that industry revisit their HACCP plans to ensure that:

- 1) their HACCP plans continue to be relevant
- 2) accurate records are available to support all aspects of verification, including validation and any HACCP plan reassessment.

## **ENFORCEMENT CONTROLS**

### ***Testing for Salmonella Species***

Correction under 1.SAMPLE COLLECTOR:

The reference to MILAB being a non-Government accreditation authority is incorrect. MILAB is now administered within NZFSA. Under the MILAB Scheme laboratory International Accreditation New Zealand accredits laboratories in accordance with ISO standards.

Please note that the same statement in relation to MILAB is made under 2 LABORATORIES on page 10.

#### Enforcement Activities

Prosecutions.

The legal references should be to the Meat Act 1981 and the Animal Products Act 1999.

#### Exit Meetings

Corrections:

Change Dr.Goeff Allen to Dr. Geoff Allen, Mr Niel Kiddey to Mr Neil Kiddey, Ms Judi Lee to Dr. Judi Lee, Programme Manager (Programme Development).  
Add Dr John Lee, Programme Manager (Market Access).

Last paragraph on page 11.

The first sentence should read: "Assurances were given by New Zealand Officials to address deficiencies noted on the basis that outstanding issues such as ASURE and those noted in this Appendix would be the subject of further dialogue between FSIS and MAF FAA.

Please note: At the time of writing MAF FAA has been incorporated into the New Zealand Food Safety Authority and continues to fulfil the role of competent authority).